



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Alec Poitevint, Treasurer
Republican National Committee - RNC
310 First Street SE
Washington, DC 20003

MAR 15 2000

Identification Number: C00003418

Reference: December Monthly Report (11/1/99-11/30/99)

Dear Mr. Poitevint:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please clarify all expenditures made for Ad Cost on Schedule B for Line 21(b). If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedule B, E or F supporting Line 23, 24 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

-Your report discloses in-kind contributions ("donations") from corporations on Schedule H4, supporting Line 21(a) of the Detailed Summary Page. Pursuant to Advisory Opinion 1992-33, the Commission concluded that a "national party committee may accept corporate in-kind donations in connection with fundraising activities" as long as "federal share of the goods or services is paid or transferred to the non-federal account in advance" of the acceptance of the corporate donations by the federal account.

Advisory Opinion 1992-33 also discloses a detailed method for reporting the receipt of corporate in-kind donations on the committee's I Schedules as follows:

The full amount of the in-kind contributions received by the non-federal account should be disclosed on Schedule I with a supporting memo Schedule A that itemizes each contributor's identification. 11 CFR 104.8(e)